

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

vs.

ARIEL LEGASSA

Case No. 22-CR-10038-IT

JOINT INITIAL STATUS REPORT

Pursuant to Local Rule 116.5(a), the parties hereby file the following joint initial status report prepared in connection with the initial status conference scheduled for April 12, 2022.

(1) Automatic Discovery/Pending Discovery Requests

The Government provided automatic discovery on March 21, 2022.

(2) Additional Discovery

The government will provide additional discovery materials if and when any become available. The defendant has not yet determined whether he will be filing discovery motions.

(3) Timing of Additional Discovery Requests

With its March 21 production, the Government requested reciprocal discovery from the Defendant. The Defendant needs more time to review the discovery and evaluate the need for any additional requests.

(4) Protective Orders

At this time, there is no protective order in this case.

(5) Pretrial Motions

It is premature to decide whether the Defendant will file any pretrial motions under Fed. R. Crim. P. 12(b).

(6) Expert Discovery

The Government agrees to provide any expert witness disclosures 21 days prior to trial. The Defendant reserves the right to request earlier expert disclosure by the Government. The Defendant agrees to provide any expert witness disclosures 14 days prior to trial.

(7) Speedy Trial Act

All of the time has been excluded from the defendant's arraignment on February 22, 2022 through the initial status conference on April 12, 2022. The parties request that the time be excluded until the interim status conference.

(8) Next Status Conference

Because there are no issues presently in dispute, the parties jointly request that the Court cancel the presently scheduled initial status conference scheduled for April 12, 2022 in lieu of this Joint Report. The parties request that the Court schedule an Interim Status Conference in approximately 60 days. The parties jointly believe that this will allow the Defendant time to review the discovery produced to date and determine whether there are any discovery or other matters to bring to the Court's attention. Further, this extension will allow the parties time to consider a resolution short of trial.

Respectfully submitted,

<p>ARIEL LEGASSA</p> <p>By his attorney,</p> <p><u>/s/ E. Peter Parker</u> E. Peter Parker Law Office of E. Peter Parker The Wheelhouse at Bradford Mill 33 Bradford St. Concord, MA 01742 peter@parkerslaw.com 617-642-7099</p>	<p>UNITED STATES OF AMERICA,</p> <p>By its attorney,</p> <p>RACHAEL S. ROLLINS United States Attorney</p> <p><u>/s/ Benjamin Saltzman</u> Benjamin A. Saltzman Assistant United States Attorney John Joseph Moakley U.S. Courthouse One Courthouse Way, Suite 9200 Boston, MA 02210 Benjamin.Saltzman2@usdoj.gov 617.748.3100</p>
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Dated: April 11, 2022

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Benjamin Saltzman

Benjamin A. Saltzman

Assistant United States Attorney

Dated: April 11, 2022